

Longworth, Gregory N.

From: Longworth, Gregory N.
Sent: Wednesday, October 16, 2024 10:09 PM
To: Michael Bartnik; liz@education-rights.com; Renee Stromski
Cc: Magy, Paul S.
Subject: RE: 22-cv-12951 Plaintiff Babcock Response to DWJBA Discovery Requests

Michael:

I have quickly reviewed the discovery responses we received yesterday for Plaintiffs Babcock and Maddox. After conditioning approval of your request for additional time to answer on Plaintiffs providing substantive answers to the interrogatories, I am disappointed that there is little in the way of substance in the answers. Further, Plaintiffs Babcock and Maddox have not “signed” the interrogatory answers as required by Rule 33(b)(5), unless you are asserting that their signatures are not required because the party answering the interrogatories is required to sign only “answers” while the party’s attorney signs objections. Further, the objections throughout are invalid, in our opinion, and not made in good faith. In addition, Rule 34(b)(2)(C) requires you to state whether or not you have withheld any documents on account of your objections; your responses fail to provide this information.

DWJBA intends to file a motion to compel discovery in the next week or so unless you promptly withdraw your objections and provide substantive answers to the interrogatories and all responsive documents, and correct the other deficiencies noted here.

Finally, in light of the magistrate judge’s requirements for the upcoming settlement conference, Plaintiffs Babcock’s and Maddox’s failure to respond appropriately impedes with DWJBA’s ability to evaluate settlement because Plaintiffs have not answered interrogatories that will determine the nature and extent of relief to which they may be entitled.

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From: Michael Bartnik <michaelbartnik@protonmail.com>

Sent: Tuesday, October 15, 2024 5:01 PM

To: Magy, Paul S. <pmagy@clarkhill.com>; Longworth, Gregory N. <glongworth@clarkhill.com>

Cc: Elizabeth Abdour (liz@education-rights.com) <liz@education-rights.com>; Renee Stromski <reneee@awlawohio.com>; Pendrick, Kimberly (AG) <PendrickK@michigan.gov>; Drysdale-Crown, Cassandra (AG) <DrysdaleCrownC@michigan.gov>; Linderman Richelew, Marla (AG) <LindermanRichelewM@michigan.gov>; Melvin Butch Hollowell <mbh@millerlawpc.com>; Angela L Baldwin <alb@millerlawpc.com>; James Heath <jheath@waynecountymi.gov>; James M Jernigan <Jjernigan@wayne county.com>; James Noseda <nosej@detroitmi.gov>; Jesse Halfon <Jesse.Halfon@detroitmi.gov>; García, Lawrence T. <Garcia@millercanfield.com>; Bierlein, Kyle <Bierlein@miller canfield.com>

Subject: 22-cv-12951 Plaintiff Babcock Response to DWJBA Discovery Requests

[External Message]

Dear Counsel,

Attached you will find Plaintiff Jill Babcock's Response to DWJBA First Set of Interrogatories and Document Requests.

A link to the dropbox is being sent separately.

Thank you.

Michael W. Bartnik
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